

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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KASHMIR GILL,

Plaintiff,

– against –

JUS BROADCASTING CORP.;
JUS PUNJABI, LLC; JUS ONE CORP;
JUS BROADCASTING CORP PVT LTD;
and PENNY SANDHU,

Defendants.
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Case No. 1:19-cv-04216 (ILG) (PK)

**NOTICE OF MOTION PURSUANT TO 28 U.S.C. § 455
FOR DISQUALIFICATION OF MAGISTRATE JUDGE PEGGY KUO**

PLEASE TAKE NOTICE that, upon the accompanying declaration of Paul Batista dated May 26, 2021, together with the exhibits annexed to that declaration, the accompanying declaration of defendant Penny K. Sandhu, and the accompanying legal memorandum, as well as upon all prior papers and proceedings in this litigation, defendants JUS Broadcasting Corp., JUS Punjabi, LLC, JUS One Corp., JUS Broadcasting Corp PVT Ltd, and Penny Sandhu will move this Court, at the Courthouse, 225 Cadman Plaza East, Courtroom 11C South, Brooklyn, New York 11201, at a date and time to be determined by the Court, for an order, pursuant to 28 U.S.C. § 455, disqualifying Magistrate Judge Peggy Kuo (the “Magistrate”) on grounds, *inter alia*, that the Magistrate’s “impartiality might reasonably be questioned” and that she has evidenced a “personal bias or prejudice concerning a party.”

PLEASE TAKE FURTHER NOTICE that, pursuant to the Magistrate’s “Individual Practice Rules,” responsive papers are to be filed within ten (10) business days after the filing of this motion.

DATED: New York, New York
May 26, 2021

PAUL BATISTA, P.C.

By 

Paul Batista

Attorney for Defendants

JUS Broadcasting Corp., JUS Punjabi,
LLC, JUS One Corp., JUS Broadcasting
Corp PVT Ltd. and Penny Sandhu

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TO: ALL COUNSEL OF RECORD

CLERK OF THE COURT